

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JILL BLOOMBERG,

Plaintiff,

v.

AFFIDAVIT OF
RAHSAN WILLIAMS

THE NEW YORK CITY DEPARTMENT OF
EDUCATION and CARMEN FARINA,

Defendant.
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STATE OF NEW YORK)
)ss:
COUNTY OF NEW YORK)

RAHSAN WILLIAMS, being duly sworn, deposes and states as follows:

1. I am a teacher at Park Slope Collegiate ("PSC") and a resident of Kings County.
2. I have personal knowledge of the facts contained in this affidavit, which I submit in support of plaintiff's motion for temporary restraining order and preliminary injunction
3. I have been a teacher at PSC for eleven years. I started as a substitute teacher while I was in graduate school earning my teaching degree. But after a few days working at PSC, I realized it was the place where I wanted to start my teaching career for many reasons.
4. The vast majority of the students at PSC are Black and Latino and come from low socio-economic backgrounds. I chose to build my teaching career at PSC because I noticed from the outset that the teaching staff and administration supporting and standing by these amazing young people through their academic achievements, learning difficulties, deaths in their families, poverty, and the injustices that they have faced due to the color of their skin.
5. Throughout my years at PSC, we have been lead by Principal Jill Bloomberg, who has emboldened us to always put our students first and to fight back against the racism that

they encounter daily. She has taught us the importance of speaking out against the ills of society, such as the social injustice of racism and segregation that has historically been a major burden for young people like the students at PSC. Principal Bloomberg has made PSC into a safe space where everyone is valued and respected, and where we have all felt secure discussing and finding creative and peaceful ways to protest the daily indignities faced by our students.

6. The safe space that has been fostered by the administration at PSC is the reason why most of the teachers at PSC have stayed loyal to the school and have dedicated themselves to building the school as a model of true integration. We teachers recognize that in order to improve the lives of students who are most at risk, we first must recognize and condemn the injustices they face. Also, this safe space has been beneficial to the students and their parents, who feel as though the race discrimination that they deal with daily is both recognized as valid and roundly condemned. In fact, the PSC's PTA is very active because they feel that the administration and teaching staff truly support their children.

7. The OSI investigation against Jill has eroded the trust and commitment that we have spent years building. It has made me fearful of standing up for our students and speaking out against race discrimination, because I'm afraid that my speaking out against racism will be seen as investigation-worthy by the DOE. It has been difficult to maintain my morale knowing that I can no longer fight for integration and anti-racism, as that activity now comes with the possibility of losing my teaching license.

8. The investigation has splintered the staff and the school environment that I once considered a second home. Because of this investigation against Principal Bloomberg, PSC has become a place wrought with tension, fear, and suspicion. Teachers who wholeheartedly support Jill are afraid to provide affidavits of support in fear of retaliation from the DOE. A few teachers

have made it clear that they are considering applying to other schools because of the chilling effect this investigation has had on our school environment. This investigation is a great disservice to our students and their families.


Sworn to before me this

25 day of April, 2017.



Notary Public

CAMILLE GREEN
Notary Public, State of New York
No. 01GR6220465
Qualified in Nassau County
Commission Expires April 12, 2018


Rahsan Williams